

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
(SOUTHERN DIVISION)**

NEIL F. LETREN,

*

Plaintiff,

*

v.

*

Civil Action No. _____

WELLS FARGO BANK, N.A.

*

Defendant.

*

* * * * *

NOTICE OF REMOVAL

Defendant, Wells Fargo Bank, N.A. (“Wells Fargo”), by its undersigned attorneys, hereby files this Notice of Removal, and pursuant to 28 U.S.C. §§ 1331, 1367, 1441, and 1446, hereby removes this civil action from the Circuit Court for Montgomery County, Maryland to this Honorable Court, and states as follows:

1. On January 14, 2015, Plaintiff, Neil F. Letren (the “Plaintiff”), filed a Complaint (the “Complaint”) against Wells Fargo in the Circuit Court for Prince George’s County, Case No. CAL14-00291 (the “State Court Action”). A copy of the Summons and Complaint filed in the State Court Action are attached hereto as **Exhibit A**.

2. Service was made upon Wells Fargo’s resident agent on February 3, 2015. *See Exhibit B*, Notice of Service.

3. Pursuant to 28 U.S.C. §1446(b), this case is removable within thirty (30) days of receipt of service by the defendant. Thus, given the date of service upon Wells Fargo, this Notice of Removal is timely.

4. This Court has federal subject matter jurisdiction and supplemental jurisdiction over this controversy pursuant to 28 U.S.C. §§ 1331 and 1367.

5. In Count I of the Complaint Plaintiff alleges violations of a federal statute: specifically, the Fair Credit Reporting Act (“FCRA”), 15 U.S.C. § 1681, *et seq.* See **Exhibit A**.

6. In Count II of the Complaint alleges a state-law claim for defamation. Pursuant to 28 U.S.C. § 1367 this Court has supplemental jurisdiction over Count II because this Count “form[s] part of the same case or controversy” alleged in Count I.

7. Thus, this Court has federal subject matter jurisdiction and supplemental jurisdiction over all of the counts alleged in this case.

8. Pursuant to 28 U.S.C. § 1446(d), a copy of this Notice of Removal has been served upon all parties and filed with the Clerk of the Circuit Court for Prince George’s County. See **Exhibit C**.

9. As of the time of this filing, this Defendant has not filed a response or entered an appearance in the State Court Action.

WHEREFORE, Defendant, Wells Fargo Bank, N.A. hereby removes this civil action to the United States District Court for the District of Maryland, Southern Division.

Respectfully submitted,

/s/ Dennis P. McGlone

Dennis P. McGlone (Bar No. 04127)

Justin E. Fine (#18731)

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Attorneys for Defendant,

Wells Fargo Bank, N.A.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 4th day of March, 2015, a copy of the foregoing Notice of Removal was sent by first class U.S. Mail, postage prepaid, to:

NEIL F LETREN
105 EAST MILL AVENUE
CAPITAL HEIGHTS MD 20743

/s/ Dennis P. McGlone

Dennis P. McGlone